

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

BRADLEY J. SCHAUFENBUEL; et al.,)	
)	
Plaintiffs,)	
)	Case No. 09-CV-1221
v.)	
)	
INVESTFORCLOSURES FINANCIAL, L.L.C.; et al.,)	Judge Leinenweber
)	
)	Magistrate Judge Nolan
)	
Defendants.)	

**SUPPLEMENT TO PLAINTIFFS' MOTION TO HOLD CERTAIN DEFENDANTS IN
CONTEMPT AND FOR SANCTIONS**

NOW COME Plaintiffs Bradley J. Schaufenbuel ("Brad S"); Robert N. Schaufenbuel ("Robert S"); John and Sarah Reed, IV ("Reed IV"); John and Jan Reed, III ("Reed III"); American Mass Media Corporation ("AMMC"); and Roberta K. Clark ("Clark"), on behalf of themselves and all others similarly situated (collectively referred to as "Plaintiffs" or "Investors"), by and through their attorneys Thurston Law Offices, P.C. and Law Offices of Joel M Weiner, LLC, and for their supplement to the pending Motion to Hold Certain Defendants in Contempt and for Sanctions state as follows:

1. Counsel for Plaintiffs were investigating an individual named "Wayne O'Day", identified on a Realty Opportunities International Document as CFO who joined in 2006. (A true and correct copy of the ROI document is attached hereto as Exhibit A, with the entry of Wayne O'Day highlighted.)

2. Further investigation revealed that Wayne O'Day is the President, Secretary and Registered Agent for AMO Realty International, Ltd. (A true and

correct copy of the Corporation Status Report from the Illinois Secretary of State's website is attached hereto as Exhibit B.)

3. Further investigation found a website for AMO Realty International, Ltd. with the web address of <http://www.2ndhomemexico.com/mexico.asp>. This website promotes the sale of two properties, one of which is Sands of Gold Estates – the same Mexico property that is subject of the proceedings before this Court. (A true and correct copy of the 2ndhomemexico.com website is attached hereto as Exhibit C.)

4. As further evidence that Frank Sanchez and ROI Mexico are violating the Standstill Agreement, they are working through Wayne O'Day and AMO Realty International, Ltd. to sell the Mexico property – note that the copyright date on the website is 2009.

Respectfully submitted,
PLAINTIFFS

By: /s/ Robert C. Thurston
One of Their Attorneys

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EXHIBIT A

The Company – ROI

- In 2004, the founders Frank Sanchez, CEO and Jim Bourassa, COO, formed InvestForClosures Ventures, L.L.C. aka Realty Opportunities International (ROI) to raise funds for the infrastructure and development of Sands of Gold Estates (SOG) in Playa Ventura, Mexico.
- Frank Sanchez is a dual citizen, and a consultant for Nafinsa (the Mexican SBA)
- In 2006, Wayne O'Day joined as CFO
- Projected residential sales of \$8.13 Billion and profit of \$1.35 Billion

The Country – Mexico

- Tremendous potential in the booming Mexican real estate market
- Ocean-front property available to ROI at bargain rates
- Safe and friendly business environment with the 1993 NAFTA agreement
- Personal connections with politicians at every level of government

The Marketing Plan

- Formally launch project with "Brick Laying" ceremony with Felipe Calderon, Mexico's President
- Invite prominent AMPI, NAR, and investor marketing firm sales people to Brick Laying to jump start sales
- Use "pre-construction" pricing to create urgency now
- Support global sales efforts with onsite sales center
- Use "GeoSherpa" 3-D internet based Virtual World (Google Earth) to promote sales (will also be used for project conceptualization on the development side)
- Target Mexico City's affluent residents for 2nd homes on the Pacific
- Assemble teams to assist clients from initial offering through move-in phases
- Once established, aggressively expand USA marketing

The Development – Sands of Gold Estates

- Located 90 minutes south of Acapulco Mexico on Hwy 200 at Playa Ventura in the State of Guerrero
- 10 miles of pristine white sand beaches, 15,000 acres, 9 phases
- 23,000 total luxury housing units, luxury hotels
- Low rise master plan gated community with 5 star resort style landscaping
- 2/3 of total acreage will be preserved and total green ground cover will be increased a minimum of 20%
- 3 golf courses, 3 resort style club houses with restaurants and spas, deep water marina with luxury yacht moorage, local air strip and heliport

The Strategy – Eco-Luxury

- Value proposition builds with each phase
- Environmentally friendly "Green" theme will be incorporated and marketed
- Eco-luxury is the desired feel in landscaping, architecture, common areas, and resort services
- Establish SOG as a Best in Class Resort
- Property rights will be insured by Stuart Title

The Team

- ROI Mexico - Development, Finance and Management
- Integrated Design Studios - Engineering
- University of Arkansas - Geospatial analysis and modeling
- World-class architectural firm – Under negotiation
- ModSystem Structures Inc. - Off-site home builders
- Marketing - NAR, AMPI, Re/Max, Exit Realty

www.roimexico.com

ROI Mexico: Your Gateway to Paradise ®

Web: www.roimexico.com
Email: info@roimexico.com

Rev 1/16/2007

EXHIBIT B**CYBERDRIVEILLINOIS**JESSE WHITE
SECRETARY OF STATE[SERVICES](#)[PROGRAMS](#)[PRESS](#)[PUBLICATIONS](#)[DEPARTMENTS](#)[CONTACT](#)**CORPORATION FILE DETAIL REPORT**

Entity Name	AMO REALTY INTERNATIONAL, LTD.	File Number	64786857
Status	ACTIVE		
Entity Type	CORPORATION	Type of Corp	DOMESTIC BCA
Incorporation Date (Domestic)	03/22/2006	State	ILLINOIS
Agent Name	WAYNE M O'DAY	Agent Change Date	02/28/2008
Agent Street Address	9654 W 131ST ST STE 213	President Name & Address	WAYNE M O'DAY 9654 W 131ST ST#213 PALOS PARK 60464
Agent City	PALOS PARK	Secretary Name & Address	WAYNE M O'DAY 9654 W 131ST ST#213 PALOS PARK 60464
Agent Zip	60464	Duration Date	PERPETUAL
Annual Report Filing Date	03/12/2009	For Year	2009

[Return to the Search Screen](#)[Purchase Certificate of Good Standing](#)
(One Certificate per Transaction)[BACK TO CYBERDRIVEILLINOIS.COM HOME PAGE](#)

EXHIBIT C

2NDHOMEMEXICO.COM



CAMPECHE PLAYA
GOLF MARINA & SPA RESORT



Sands of Gold Estates
at Playa Ventura



&DP SH-FKH J6 DCGMFI* RCH 15 HTX-HW0 RUH,GRUP DNRG

11111 \$0 2 15 F-DOM, QM, CDV, PCD 7' 1 \$ 05 UKW5 HV-HY-HIL J6 DME, I' (92



Sands of Gold Estates

at Playa Ventura

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Sands of Gold Estates

ROI MEXICO: YOUR GATEWAY TO PARADISE™



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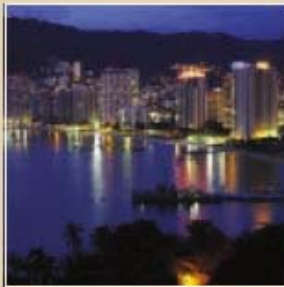
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Searching for oceanfront property that is peaceful, idyllic, untouched...and affordable?

Build your luxury dream home, vacation getaway, or second home on the Pacific Ocean in a secluded 3,500 acre Mexican hideaway, just 62 kilometers to the south of Acapulco.

Sands of Gold Estates lies on pristine coastal land that has been untouched for generations. Live life the way you want to in a private residential community, and enjoy all that the ancient lands of Pacific Mexico have to offer.

Relaxing. Quiet. Peaceful.

The secluded paradise that is Sands of Gold Estates is in the Mexican state of Guerrero. The natives call their home Playa Ventura, after the Ventura family, who still own much of the surrounding land.

Playa Ventura, like all of Pacific Mexico, is a land washed by the ocean and sheltered by the western mountains. The sun rises over the Sierra Madre Occidental and its southern extension, the Sierra Madre del Sur.

These green, jungle-clad sierras descend to a narrow coastal strip where Sands of Gold Estates are perched over the Pacific. Your new property will be part of a vast, sun-drenched western coastland that stretches along 1,000 miles of sandy beaches, palm-strewn headlands and blue lagoons.



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Tropical, Secluded and Safe.

It's always summer at Sands of Gold Estates. You can swim, surf, horseback ride, fish, bike ride, snorkel and hike year-round. Typical daytime temperatures hover between 80° F and 85° F degrees; 65° F to 70° F degrees at night. The tropical rain season lasts only from July through September.

Sands of Gold Estates maintains a high level of security year round. In addition to our independent security, Mexican federal government officers are headquartered on the beach, which is located in the southern extension of a protected area for giant sea turtles. This naturally protected location is ideal for coastal enthusiasts who not only want to own beach front property, but also enjoy the natural romance of watching the sun melt into the Pacific waters nightly.

This Land is Your Land.

How you'll live at Sands of Gold Estates is up to you, because you decide what style of home fits your needs. Offered by Realty Opportunities International (ROI) Mexico, an international property development and investment company, land at Sands of Gold Estates is available at a **fraction of the cost** of comparable oceanfront properties elsewhere in Mexico and the U.S. Modern infrastructure and communications will supply familiar U.S. comforts. A paved access road leads to the ocean, and a fresh water lagoon will provide 100 percent clean spring water. Infrastructure is in place for basic telephone and electric services; ROI Mexico will install modern amenities, including Internet service and cell phone capability.



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We are happy to hear from you! Send us your questions, comments, or feedback.

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Must be at least 10 characters and less than 1000.

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